Daniel Ralph Treccia
2078 US HWY 98 W, STE 105-PMB 150
Santa Rosa Beach, FL 32459
Defendant, Pro Se (Appearing Specially)

IN THE CIRCUIT COURT FOR THE TWENTY FIRST JUDICIAL DISTRICT OF TENNESSEE, WILLIAMSON COUNTY

TIMOTHY J. PAGLIARA,
Plaintiff,

v.

DANIEL R. TRECCIA,
Defendant.

Case No.: 24cv-326

Hearing Date: July 28, 2026

DEFENDANT'S SPECIAL APPEARANCE AND MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND TO QUASH NOTICE OF HEARING

Defendant, Daniel R. Treccia, making a Special Appearance for the limited purpose of challenging personal jurisdiction and the sufficiency of service of process pursuant to **Tennessee Rules of Civil Procedure 12.02(2) and 12.02(5)**, respectfully moves this Court to dismiss the underlying civil action, void the default judgment, and quash the Notice of Hearing scheduled for July 28, 2026 [1.2.1].

Numbered Factual Paragraphs:

- **1.** Defendant does not submit to the jurisdiction of this Court and files this motion solely to challenge the Court's authority over the Defendant.
- **2.** The Court's docket is devoid of any valid Affidavit of Service or Return of Service proving the Defendant was lawfully served with the original summons and complaint.
- **3.** Plaintiff attempted service by mail at 432 Lewis Rd., Geneva, IL 60134-4414. This address is not, and has not been, the Defendant's dwelling house or usual place of abode.

- **4.** As evidenced by Exhibit A (USPS Tracking and Forwarding Documentation) and Exhibit B (Florida REAL ID Drivers License), the correspondence was not delivered to the Defendant's residence but was forwarded out of state.
- **5.** Because service of process was never perfected, the Court never acquired personal jurisdiction over the Defendant. Consequently, the default judgment and any subsequent injunctions or contempt citations are void *ab initio*.
- **6.** Defendant respectfully requests that the Court rule on the written record without the necessity of a hearing, dismiss the matter entirely, and cancel the July 28, 2026 hearing.

Respectfully submitted on this 14 of July, 2026,

Daniel Ralph Treccia

Address for Correspondence (Service of Documents Only):

2078 US HWY 98 W, STE 105-PMB 150
Santa Rosa Beach, FL 32459

VERIFICATION

I, Daniel Ralph Treccia, state that I am the Defendant in the above-captioned matter. I have read the foregoing "Motion to Dismiss," and the facts stated therein regarding my residency and the lack of proper service are true and correct to the best of my knowledge, information, and belief.

FURTHER AFFIANT SAYETH NAUGHT.

Daniel Ralph Treccia

STATE OF FLORIDA COUNTY OF WALTON

Subscribed and sworn to before me this 13 (14) day of July, 2026.

Notary Public My Commission Expires: July 30, 2029

State of FL County of Walton
Subscribed and sworn to (or affirmed) before me on this
14 day of July, 2026 by
Daniel Ralph Treccia proved to me on the basis
of satisfactory evidence to be the person(s) who appeared before me.
Notary Signature: Kasey Goodwin

NOTARY PUBLIC STATE OF FLORIDA

KASEY GOODWIN
Commission # HH 704870
Expires July 30, 2029

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing *Special Appearance and Motion to Dismiss* has been served upon counsel for the Plaintiff by placing a copy of the same in the United States Mail, postage prepaid, on this 14th day of July, 2026, addressed as follows:

Bulso PLC

155 Franklin Road, Suite 400

Brentwood, Tennessee 37027

Daniel Ralph Treccia

9589 0710 5270 3117 3335 18

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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Brentwood, TN 37027

OFFICIAL USE

Certified Mail Fee	$5.55
Extra Services & Fees (check box, add fee as appropriate)	$4.65
☐ Return Receipt (hardcopy)	$0.00
☐ Return Receipt (electronic)	$0.00
☐ Certified Mail Restricted Delivery	$0.00
☐ Adult Signature Required	$0.00
☐ Adult Signature Restricted Delivery	$
Postage	$2.56
Total Postage and Fees	$12.76

SANTA ROSA BEACH FL 0774 95
JUL 14 2026
Postmark Here
07/14/2026
USPS 32459-0774

Sent To

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

TRACK STATUS BY TEXT MESSAGE
Send tracking number to 28777 (2USPS)
Standard message and data rates may apply

TRACK STATUS ONLINE
Visit https://www.usps.com/tracking
Text and e-mail alerts available

PURCHASE DETAILS

Product	Qty	Unit Price	Price
Mailer 10.5 x 16	1	$1.89	$1.89
First-Class Mail® Large Envelope Brentwood, TN 37027 Weight: 0 lb 3.20 oz Estimated Delivery Date Sat 07/18/2026	1		$2.56
Certified Mail® Tracking #: 9589 0710 5270 3117 3335 18			$5.55
Return Receipt Tracking #: 9590 9402 9679 5199 3338 66			$4.65
Total			$12.76
Grand Total:			$14.65
Debit Card Remit Card Name: VISA Account #: XXXXXXXXXXXX1005			$14.65

Shipment Receipt: Page #1 of 1

THIS IS NOT A SHIPPING LABEL. PLEASE SAVE FOR YOUR RECORDS.

SHIP DATE:
TUES 14 JUL 2026

EXPECTED DELIVERY DATE:
WED 15 JUL 2026 10:30 AM

SHIP FROM:
DANIEL RALPH TRECCIA
4000 GULF TERRACE DR
SRE 128
DESTIN FL 32541

(331) 325-2314

SHIP TO:
WILLIAMSON COUNTY JUDICIAL CENTER
WILLIAMSON COUNTY CIRCUITCOURT CLE
135 4TH AVE S
FRANKLIN TN 37064-2500
BUSINESS

SHIPPED THROUGH:
THE UPS STORE #7356
SANTA ROSA BEACH,FL 32459-5373
(850) 759-4900

SHIPMENT INFORMATION:
UPS NEXT DAY AIR COM
0 lb 2.5 oz actual wt
LTR Billed Weight
CARRIER LETTER

TRACKING NUMBER: 1Z42R6230106368622
SHIPMENT ID: MMWY6KBV38D2K
SHIP REF 1: - -
SHIP REF 2: KG

DESCRIPTION OF GOODS:
DDCOUMENTS

SHIPMENT CHARGES:

NEXT DAY AIR COM	52.31
SERVICE OPTIONS	0.00
FUEL SURCHARGE	12.95
CMS PROCESSING FEE	0.22
TOTAL	$65.48

COMPLETE ONLINE TRACKING: ENTER THIS ADDRESS IN YOUR WEB BROWSER TO TRACK: HTTP://THEUPSSTORE.COM (SELECT TRACKING, ENTER SHIPMENT ID #) SHIPMENT QUESTIONS? CONTACT SHIPPED THROUGH ABOVE.
NEED PACKAGE HELP? (LOST/DAMAGED). PROVIDE DETAILS SO WE CAN HELP: HTTPS://ONLINE.UPSCAPITAL.COM/TCCP

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